

As a long time CW operator and experimenter on 160 meters I strongly support RM-10352 that sets aside 1800-1843 kHz. for narrow band modes of operation. I believe that this proposal will still provide more than ample spectrum for wide band modes.

Worldwide usage of the 160-Meter amateur band has increased dramatically. More countries now permit operation on this band, or have expanded the range of frequencies for amateur radio operation. This expansion of operating privileges is continuing, as witnessed by an expansion of Japanese amateur radio privileges on this band little more than a year ago.

Use of this band has increased even during the peak of the current 11-year sunspot cycle, when propagation at this frequency is less predictable and less reliable than at times of lower solar activity. In the next few years, as propagation improves at lower frequencies, more amateurs will use the 160 Meter band, and current users are likely to increase the time spent operating on this band.

While voluntary band plans are useful, they do not have the force of law and are not adhered to by all amateur radio operators. Despite a formal bandplan supported by the American Radio Relay League, there is still much wide bandwidth (SSB or AM) operation below 1.843 MHz. FCC enforcement of interference disputes will be simplified through regulation imposing a division between operating modes. This action would be consistent with other HF amateur bands.

Respectfully submitted
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